

COMPOSITE EXHIBIT 1

Declaration of Till Paris

I. Introduction:

I, Till Paris, declare that I have read the foregoing instrument, and the facts and information stated therein are true, accurate and correct to the best of my knowledge. I am personally acquainted with the facts herein stated.

II. Professional Background:

1. I am the President and Founder of Digital Compliance Lab, LLC (hereinafter “DCL”), which is based in Encinitas, California.

2. My company was retained by the ADA Legal Team, LLC counsel for Robert (Bob) Glen Myers.

3. The Plaintiff has established that he is visually impaired and asserts his rights under the Americans with Disabilities Act (ADA).

4. I have been retained to provide consulting services, including auditing websites for compliance, usability, and accessibility standards (WCAG 2.1 A and AA), as well as general coding/functionality analysis for disabled/blind users.

5. My duties with DCL include serving as the principal investigator, testifying expert, and overseeing all aspects of digital accessibility audits, compliance reviews and coding/functionality analysis.

6. I have extensive experience in artificial intelligence (AI), advanced programming, website development, data architecture/analytics, digital accessibility, usability, and WCAG compliance. My work focuses on creating human-centric web experiences and ensuring all projects adhere to the highest standards of digital accessibility. I provide my Curriculum Vitae (hereinafter “CV”) to describe my experience and professional background. My CV is attached as “Exhibit A.”

7. Specific to website functionality, I have experience in the design, layout, coding, auditing, analyzing, and testing of functionality, security, and operability of websites and their content/materials.

8. Specific to ADA Compliance, I have audited and/or directed or directly supervised more than 1000 websites in my career. Included in this work are websites for all major industries that operate on many different platforms.

9. My work has identified websites that were both WCAG-compliant as well as non-compliant with WCAG. For the websites that were found to be non-compliant, those entities often relied on my work to conduct audits, bolster their remediation efforts, and effectively correct the issues they were facing.

III. Findings:

10. In the present matter, DCL, with me as the principal investigator, was retained by Plaintiff, a visually impaired user of the internet/cyberspace, to determine whether the website of Urban Chestnut Brewing Company, Inc. (hereinafter “Company”), urbanchestnut.com had compliance issues that could not be overcome, significantly impair website usability for visually impaired user and as such these issues acted as barriers to their use and enjoyment of the website.

11. As part of my retention, I originally evaluated the Company’s website on January 14, 2025, and determined that issues with the website do exist, and these issues would be a barrier to individuals with low to no vision, like Plaintiff. The issues identified by either Plaintiff or via my independent evaluation included, but were not limited to, the following:

a. Modal dialog inaccessible for screen reader users - The modal dialog lacks role and aria attributes, and keyboard focus can shift to background content. This causes users with visual disabilities to struggle to interact with modal dialogs due to focus issues, leading to navigation frustration.

b. Missing textual description for informative image - Informative images lack textual descriptions, preventing screen reader users from understanding their purpose. This omission leaves users with visual disabilities unable to grasp the significance of images, hindering their comprehension of content.

c. Missing skip to content link - The website lacks a 'Skip to content' link, forcing users to navigate through repetitive content. This issue forces users with visual disabilities to struggle to access the main content quickly, leading to inefficient navigation.

d. Missing heading mark-up - H1 - The absence of an H1 heading makes it difficult for screen reader users to understand the page structure. This lack causes users with visual disabilities to find it challenging to comprehend content organization, affecting their overall experience.

e. Unnecessary alt text for decorative image - Decorative images have descriptive alt text,

which is unnecessary and unhelpful for users with visual impairments. This practice leads to users with visual disabilities encountering irrelevant information, complicating their navigation and understanding of page content.

f. Headings not announced for visually impaired users - Text elements are not marked as headings, leaving users unaware of section purposes. As a result, users with visual disabilities struggle to discern section relevance, impacting their navigation efficiency.

g. List mark-up used incorrectly - Interactive images are incorrectly marked as list items, causing confusion for screen reader users. This problem makes users with visual disabilities find difficulties interpreting content, hindering their understanding and navigation.

h. Use of multiple heading 1's <h1> - Multiple H1 headings are used, confusing screen reader users about page structure. Therefore, users with visual disabilities may find it challenging to understand the page hierarchy, negatively impacting their navigation.

i. Non-descriptive and identical links announced for screen reader users - Links like 'Reserve Tickets' lack descriptive text, making it hard for users to understand their purpose. This lack of clarity leads to users with visual disabilities struggling to identify link destinations, creating confusion and inefficient navigation.

j. Role defined inappropriately - Incorrect role definition on 'Reserve Tickets' links confuses screen reader users. As a result, users with visual disabilities face challenges understanding element purposes, affecting their interaction with the page.

k. Non-descriptive link text - Link text 'Reserve Tickets' does not indicate they open in a new window, causing confusion for screen reader users. Because of this, users with visual disabilities may be unaware of new windows opening, disrupting their browsing experience.

l. Missing keyboard support - Keyboard support is absent for form fields like 'date picker,' affecting users with mobility impairments. This issue causes users with visual disabilities who rely on keyboards to face difficulties accessing form functionality, limiting their interaction.

m. Non-interactive elements receive keyboard focus - Non-interactive elements receive focus due to incorrect 'tabindex' usage, adding unnecessary tab stops. Thus, users with visual disabilities encounter confusion and inefficiency navigating through the extra focus stops.

n. Incorrect alternate text for image link - Logo image link has inaccurate alt text, failing to convey visual information accurately. Therefore, users with visual disabilities cannot access the intended information conveyed by the image, affecting their understanding.

o. Breadcrumb links not accessible by screen reader - Breadcrumb links do not convey visual information to assistive technologies, posing navigation challenges. Therefore, users with visual disabilities struggle with navigation due to the lack of role information, hindering their browsing experience.

p. Heading mark-up used unnecessarily - Text like '\$12.00' is incorrectly marked as a heading, confusing screen reader users. This incorrect marking results in users with visual disabilities potentially misunderstanding content structure, leading to navigation difficulties.

q. Empty heading found in page source code - An empty heading is present, confusing screen reader users about content structure. This makes users with visual disabilities think they are missing content, affecting their understanding of the page.

r. The 'Add to Cart' message not announced for screen reader users - Screen reader focus does not shift to updated content after adding to cart, leaving users unaware of changes. As a result, users with visual disabilities miss crucial status updates, impacting their shopping experience on the website.

These issues collectively impede accessibility and usability, are non-complaint with the WCAG, and remediation efforts should include clear alt text, proper ARIA roles, and structural improvements aligned with WCAG 2.1 Level A or AA standards.

12. That Company's website did not contain an accessibility statement, which is typically included to inform users of the company's commitment to accessibility and the measures taken to ensure compliance with accessibility standards.

IV. Audit Methodology:

13. DCL employs an automated audit program that assesses websites for WCAG compliance. The automated auditing program evaluates and identifies compliance and accessibility issues that served as barriers to the Plaintiff or someone similarly situated as well as specific violations of the WCAG.

14. Additionally, DCL conducts a manual auditing process that assists in developing the manual Accessibility Validation Audit. A copy of the Accessibility Validation Audit is provided as "Exhibit B."

15. The manual Accessibility Validation Audit conducted by DCL identified numerous Level A and/or AA issues. All identified issues contribute to accessibility problems for users

with low or no vision using a screen reader and keyboard to navigate and are non-compliant. The manual Accessibility Validation Audit examines a website for features that could impact a user's access to its functionalities in light of the standards presented by WCAG 2.1 Level A or AA.

V. Conclusion:

16. In addition to the usability and functionality issues herein, many also directly violate WCAG 2.1 Level A or AA. Taking both the automated auditing process and independent manual Accessibility Validation Audit (attached to this declaration), it is my expert opinion, and with a high degree of technical and scientific certainty, that the website urbanchestnut.com has defects that can and will continue to create substantial problems for visually disabled persons, such as the Plaintiff. These defects act as a barrier to the effective use and enjoyment of the website for persons with low to no vision.

Accordingly, I reserve the right to update, alter, change, delete, and supplement, or alternatively file a supplement to this declaration if provided with additional relevant material.

DECLARANT FURTHER SAYETH NOT.

Under penalty of perjury, I hereby affirm that the foregoing statements are true and correct.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Till Paris", with a stylized, cursive script.

Till Paris

April 11, 2025

EXHIBIT A

Till Paris
1106 Second St. #231
Encinitas, CA 92024

Professional Experience

Digital Compliance Labs, LLC, San Diego, California
Chief Executive Officer (February 2024 to Present)

As the CEO of Digital Compliance Labs, I specialize in website/application compliance, accessibility, and privacy compliance solutions. I ensure ADA and WCAG compliance for websites/applications through expert audits, user testing, remediation, and compliance consulting. Our mission is to create accessible digital experiences for all users and support legal compliance. My work ensures digital experiences are fully accessible to all users while addressing critical legal compliance challenges with precision and expertise. Additionally, I specialize in the technical implementation of data privacy regulations, including the GDPR, CCPA, and APRA.

- Executed in-depth audits, reports, and scans of websites and applications, leading global remediation initiatives for clients navigating compliance challenges and accessibility lawsuits.
- Coordinated user testing sessions to enhance website compliance, accessibility, and usability.
- Provided compliance consulting services to help clients meet legal and regulatory requirements for the WCAG 2.1 and 2.2 A/AA.
- Developed and implemented technical data privacy strategies to ensure compliance with GDPR, CCPA, and APRA.

Dream Team Media, San Diego, California
Chief Executive Officer (May 2003 to Present)

As the CEO of Dream Team Media, I lead a digital marketing, strategy and consulting firm. We specialize in advanced programming, AI integration, and database architecture to create human-centric website/application experiences. We develop sophisticated web projects and services, having collaborated with numerous Fortune 500 companies. Our approach emphasizes creativity and best practices, ensuring the creation of inclusive and accessible digital experiences for everyone to enjoy.

- Developed advanced AI systems and organized data, significantly enhancing the quality and intelligence of responses in large-scale critical data projects.
- Ensured all web projects followed best practices for digital accessibility, focusing on WCAG audits and ADA compliance to make our solutions inclusive.
- Created and delivered comprehensive digital solutions, improving user experience and functionality for numerous clients.
- Collaborated directly with Fortune 500 companies to provide tailored digital solutions that meet their specific needs.

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